BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001 RECEIVED

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

EXPERIMENTAL PRESORTED PRIORITY MAIL RATE CATEGORIES, 2001

Docket No. MC2001-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR ENTRY OF DIRECT TESTIMONY INTO EVIDENCE (May 18, 2001)

On May 17, 2001, the United States Postal Service filed a Stipulation and Agreement, representing a negotiated settlement by the parties of the issues raised in this proceeding. In a concurrently filed motion requesting consideration of that Stipulation and Agreement, the Postal Service requested that the May 21, 2001, hearings be canceled, considering that no parties intended to conduct cross-examination of the witnesses scheduled to testify. In lieu of hearings, the Postal Service proposed that it be permitted, by written motion, to request that the direct testimony of its witnesses be entered into evidence.

The Postal Service hereby moves that the Docket No. MC2001-1 testimony of witnesses Scherer (USPS-T-1), Levine (USPS-T-2), and Kalenka (USPS-T-3) be entered into evidence. In support of this motion, the Postal Service is providing the Commission with two copies of each testimony and a Declaration from each witness.

For the convenience of the parties, copies of the Declarations are attached.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

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Michael T. Tidwell

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DECLARATION

I, Thomas M. Scherer, hereby declare, under penalty of perjury, that my Postal Rate Commission Docket No. MC2001-1 testimony on behalf of the United States

Postal Service (USPS-T-1) is true to the best of my knowledge, information, and belief.

Thomas M. Scherer THOMAS M. SCHERER

May 18, 2001

Date

DECLARATION

I, Jonathan Levine, hereby declare, under penalty of perjury, that my Postal Rate Commission Docket No. MC2001-1 testimony on behalf of the United States Postal Service (USPS-T-2) is true to the best of my information, knowledge and belief.

DECLARATION

I, Robert Kalenka, hereby declare, under penalty of perjury, that my Postal Rate Commission Docket No. MC2001-1 testimony on behalf of the United States Postal Service (USPS-T-3) is true to the best of my information, knowledge and belief.

Robert Kalenka

Date

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing documents upon all participants of record in Postal Rate Commission Docket No. MC2001-1 in accordance with section 12 of the Rules of Practice and Procedure.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2998; Fax -5402 May 18, 2001